

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ANGEL SANTIAGO,

Plaintiff,

Docket No.: 1:17-cv-00101-PAE

-against-

ID&T/SFX MYSTERYLAND LLC, BETHEL WOODS
CENTER FOR THE ARTS, D & E PARTNERS, INC.,
S&B GROUP ENTERPRISES, LLC, CHRISTIE LITES
LLC, CONTEMPORARY SERVICES CORPORATION,
CSS SECURITY, INC., GREEN MOUNTAIN CONCERT
SERVICES, INC., STRIKE FORCE PROTECTIVE
SERVICES, INC., VENUE SMART, KEL EXECUTIVE
SERVICES, ABC CORPS.1-100 (Fictitious entities),
& John Does1-100(Fictitious Names),

**ANSWER TO CROSS-CLAIMS
OF DEFENDANT
GREEN MTN CONCERT
SERVICES, INC.**

Defendants.
-----X

The defendants, **CONCERT SERVICES SPECIALISTS, INC. d/b/a CSS SECURITY, INC.** by their attorneys, **MORRIS DUFFY ALONSO & FALEY**, upon information and belief, answers the Cross-Claims of defendant **GREEN MTN CONCERT SERVICES, INC.** upon information and belief as follows:

1. Defendant **CONCERT SERVICES SPECIALISTS, INC. d/b/a CSS SECURITY, INC.** hereby denies the cross-claims asserted against them in the unnumbered paragraphs designated "**AS AND FOR A CROSS-CLAIM FOR CONTRIBUTION AND/OR INDEMNIFICATION AGAINST THE CO-DEFENDANTS ID&T/SFX MYSTERLAND LLC *et al***" and respectfully refers all questions of law to the Court at the time of trial.

WHEREFORE, defendant **CONCERT SERVICES SPECIALISTS, INC. d/b/a CSS SECURITY, INC.** hereby demands judgment dismissing the cross-claims made against them by

defendant **GREEN MTN CONCERT SERVICES, INC.** in their entirety, with prejudice, and awarding the answering defendant with appropriate costs and disbursements for the defense thereof, together with such other, further and different relief as this Court deems just and proper.

Dated: New York, New York
October 16, 2017

MORRIS DUFFY ALONSO & FALEY

By: 

CHRISTOPHER R. INVIDIATA
Attorney for Defendants
Concert Service Specialists, Inc
d/b/a CSS SECURITY, INC.
Office and Post Office Address
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New York, New York 10006
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Our File No.: (SD) 67594

TO: LAW OFFICE OF PIEKARSKY & ASSOCIATES LLC,
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File No. NYSY-32842
Attn: William A. Prinsell, william.prinsell@chartisinsurance.com

AFFIDAVIT OF SERVICE BY MAIL AND ECF

STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

CASSANDRA RIDDICK, being duly sworn, says: I am not a party to the action, am over 18 years of age and reside in New York, New York. That on the 17th day of October 2017, I served the within **ANSWER TO CROSS-CLAIMS OF DEFENDANT GREEN MTN CONCERT SERVICES, INC.** upon:

LAW OFFICE OF PIEKARSKY & ASSOCIATES LLC,
Attorney for Plaintiff
ANGEL SANTIAGO
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F: (201) 560 -1440
Attn: Mark Faro, Esq., mfaro@pielaw.com
Attn: Scott B. Piekarsky, spiekarsky@pielaw.com

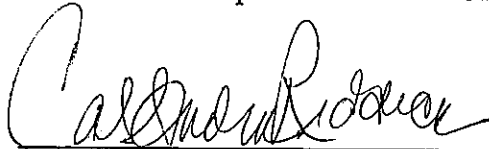
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Attn: Steven Howard Rosenfeld, steven.rosenfeld@hrrvlaw.com

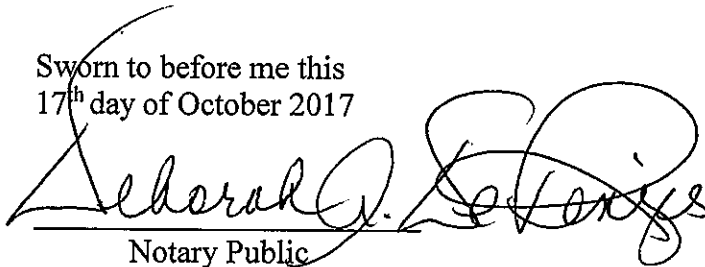
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those being the addresses designated by said attorneys for that purpose, by depositing a true copy of same enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department and the Unified Electronic Court Filing System.


CASSANDRA RIDDICK

Sworn to before me this
17th day of October 2017


Notary Public

DEBORAH A. DERENZIS
Notary Public, State of New York
No. 01DE6089503
Qualified in Richmond County
Commission Expires March 24, 2019

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